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February 6, 2006

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Via Federal Express

Document Processing Center (Mail Code 7407M)
Room 6428
Attention: 8(e) Coordinator
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
1201 Constitution Ave., NW
Washington, D.C. 20460

Dear 8(e) Coordinator:

2,3,3,3-Tetrafluoro-2- [1,1,2,3,3,3-hexafluoro-2- [1,1,2,2-tetrafluoro-2-(fluorosulphonyl)ethoxy]propoxy]propionyl fluoride
CAS# 4089-58-1

This letter is to inform you of the results of a pre-1977 (1976) subacute inhalation study that recently came to our attention, on the above-referenced test substance.

The test substance (~ 2.7 ppm) was administered by inhalation (whole body exposure) to a group of 10 Ch-R CD male rats for 4 hours/day, 5 days /week for 2 weeks. The control group was exposed only to houseline air. Rats were monitored for body weight changes and clinical signs of toxicity, and blood and urine samples were collected after the ninth exposure. After the last exposure, half the rats in each group were sacrificed for histopathological examination and the remaining animals were sacrificed two days post-exposure with no histopathological exam.

There were no clinical signs observed and body weights were similar to the controls. Lesions believed to be an acute inflammatory response to a moderate insult and characterized by alveolar hemorrhage, bronchial epithelial hypertrophy, and perfuse extensive peribronchiolar intra-alveolar inflammatory cell accumulation were observed in all rats exposed to the test substance. In addition, an approximate four-fold increase in urine fluoride concentrations was observed in rats exposed to the test substance.

A follow-up study was conducted by the same design with two modification, namely, 1) that after the last exposure, half the rats in each group were sacrificed for histopathological examination and the remaining animals were sacrificed 14 days post exposure for histopathological exam, and 2) blood and urine samples were not collected. The test concentrations were 0, 0.41 or 0.98 ppm. No significant adverse effects relative to clinical or histopathologic indices were observed in the test animals.

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Under these experimental conditions, the findings described above are being reported in accordance with the guidance given in the EPA TSCA Section 8(e) Reporting Guide (June 1991).

Sincerely,

A. Michael Kaplan, Ph.D.
Director – Regulatory Affairs and Occupational Health

AMK: clp
(302) 366-5260